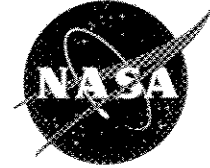National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

January 6, 2010

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Space
            Foundation Reception on January 20, 2010

On January 20, 2010, the Space Foundation, a non-profit organization under 501(c)(3) of the
Internal Revenue Code, and co-sponsor MacDonald, Dettwiler and Associates, LTD., will host a
reception at the Canadian Embassy Hotel, in Washington, D.C., from 6:00p.m.-8:00p.m. This
event is in appreciation of friends and supporters of the Space Foundation.

Approximately 400 individuals have been invited. Attendees will include NASA personnel,
officials from other federal agencies, members of Congress and their staffers and representatives
of academia, and industry and other aerospace associations. The estimated cost of the reception,
which includes all food and beverages is $42.00 per person.

I find that this event meets the requirements of a "widely attended gathering" as defined in
5 CFR § 2635.204(g). I further determine that there is an Agency interest in having NASA
personnel attend the event because they will have the opportunity to share views on the civil
space program with their counterparts in civil, commercial, national security and international
space. Moreover, NASA employees whose duties do not substantially affect the event sponsors,
including NASA employees in non-career positions who are required to sign the ethics pledge
under Executive Order 13490, may accept an invitation for free attendance to the event for
themselves and their invited guests.

However, NASA employees whose duties may substantially affect the event sponsors, or a
majority of its members, such as by way of procurement duties, should seek an individual
determination pursuant to 5 CFR § 2635.204(g)(3)(i) regarding participation in this event from
their local ethics counselor.

Adam F. Greenstone